

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio



United States of America

v.

Hussein A. Mohamed

Case No. 2:24-mj-253

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 11, 2024 and April 16, 2024 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 U.S.C. 2113
18 U.S.C. 371

Bank robbery
Conspiracy

Offense Description

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Tyler Schwab, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/14/2024

City and state: Columbus, Ohio


Kimberly A. Johnson
United States Magistrate Judge



I, Tyler Schwab, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a complaint against Hussein A. MOHAMED for violations of 18 U.S.C. § 2113, bank robbery, and 18 U.S.C. § 371, conspiracy.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 6, 2019. Your Affiant has been assigned to the FBI Safe Streets Task Force in Columbus, Ohio, since January of 2023. Prior to being assigned to the Safe Streets Task Force, I was assigned to the Joint Terrorism Task Force (JTTF) for approximately four years. During my assignment at the JTTF, I was a Case Agent and Co-Case Agent for multiple international and domestic terrorism investigations. While assigned to the JTTF, your Affiant received specialized training in international terrorism and homicide investigations. Furthermore, I have received training in computer-related crimes as well as in the criminal use of email, social media, and telephonic communications.

3. This affidavit is not intended to include each and every fact and matter observed by or made known to Agents of the government. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

4. More specifically, evidence obtained by your Affiant, provided in detail below, indicates that Hussein A. MOHAMED was responsible for the bank robberies of the Telhio

Credit Union located at 5380 North Hamilton Road, Columbus, Ohio 43230, on April 11, 2024, the Fifth Third Bank located at 1340 Bethel Road, Columbus, Ohio 43220, on April 16, 2024, and the Huntington Bank located at 1928 North High Street, Columbus, Ohio 43210 on April 16, 2024. All three bank robberies occurred within the Southern District of Ohio.

Bank Robbery #1-Telhio Credit Union, 5380 North Hamilton Road, Columbus, Ohio 43230

5. On April 11, 2024, at approximately 4:41 p.m., Detectives with the Columbus Police Department responded to 5380 North Hamilton Road in reference to a bank robbery. Upon arrival, the detectives learnt that a suspect entered the Telhio Credit Union wearing a dark colored Patagonia sweatshirt, light colored ripped jeans, white covid mask, and black winter style hat. The suspect approached the bank manager and pulled out his cell phone. There was a message on the suspect's cell phone demanding money. The bank manager gave the suspect approximately \$2,000 in cash. The suspect then fled the bank on foot.

6. Telhio Credit Union provided the below photo of the suspect from April 11, 2024.



Bank Robbery #2-Fifth Third Bank, 1340 Bethel Road, Columbus, Ohio 43220

7. On April 16, 2024, at approximately 3:57 p.m., Detectives with the Columbus Police Department responded to 1340 Bethel Road in reference to a bank robbery. Upon arrival,

the detectives learnt that a suspect entered the Fifth Third Bank wearing a red hooded sweatshirt, blue covid mask, light colored jeans, and black New Balance shoes. The suspect approached the bank manager and showed the bank manager his phone. There was a message on the suspect's cell phone demanding all the money from the bank manager's teller station. The bank manager gave the suspect approximately \$1,073 in cash. The suspect then fled the bank on foot.

8. Fifth Third Bank provided the below photo of the suspect from April 16, 2024.

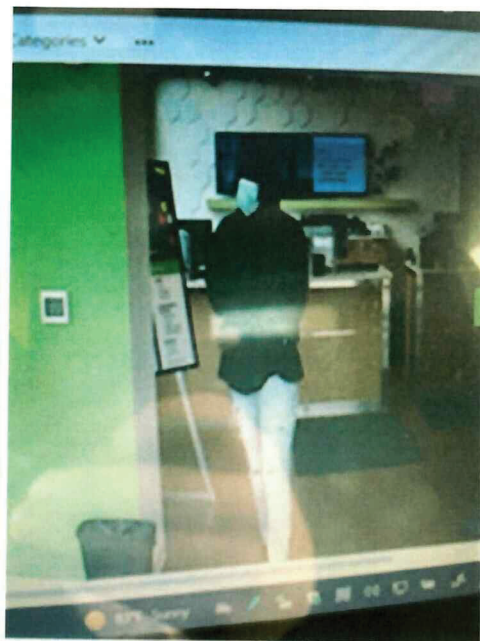


Bank Robbery #3-Huntington Bank, 1928 North High Street, Columbus, Ohio 43201

9. On April 16, 2024, at approximately 4:42 p.m., Detectives with the Columbus Police Department responded to 1928 North High Street in reference to a bank robbery. Upon arrival, the detectives learnt that a suspect entered the Huntington Bank wearing a black hooded sweatshirt, black stocking cap, light colored jeans, blue covid mask, and black shoes. The suspect approached the teller and showed the teller his phone. On the suspect's phone was a message demanding money and that he had a weapon. The teller then gave the suspect approximately \$2,000 in cash. The suspect then told another teller to empty her drawer. That teller told the suspect she did not have any money in her drawer and opened the drawer to show

the suspect. The suspect then pulled a black handgun from his waist inside his pants, racked the slide, and forced the tellers into the vault room while making threats. Once in the vault, the suspect took all the money that was stacked there, which was approximately \$20,000. The suspect then left the vault, and the tellers locked themselves inside the vault until the suspect had left the bank.

10. Huntington Bank provided the below photo of the suspect from Robbery #3, on April 16, 2024.



11. Investigation revealed that during this robbery, the suspect may have touched the interior of the vault door during the commission of the robbery. Investigators who later responded to the scene attempted to gather evidence from the vault door so that future attempts at deoxyribonucleic acid ("DNA") comparison could be made.

12. During this bank robbery, the bank tellers were able to activate and place a GPS device into the stack of money that the suspect took from the bank. Following the robbery, Columbus Police Department Detectives were able to track the GPS to the area of Lane Avenue

and Indianola Avenue where the GPS device was located on the ground. A canvass for security video footage in the area of Lane Avenue and Indianola Avenue was conducted. Detectives were able to locate videos that collectively showed two individuals in a silver Honda Accord with Ohio license plate HXS8626 driving away from the Huntington Bank. One of the individuals can be seen on video throwing the bank's GPS device out the window of the vehicle.

13. A photo of the silver Honda Accord from a security camera is below:



14. The silver Honda Accord with Ohio license plate HXS8626 is registered to Saida Sheolh.

15. An analysis of the records provided by T-Mobile indicated that phone numbers (614) 604-2595 and (614) 779-3279 were present at all three robbery locations during times of bank robberies. Additionally, the analysis of the T-Mobile records also indicated that cell phone number (614) 779-3279 called (614) 604-2595 while at the 5380 North Hamilton Road location approximately at the time of Bank Robbery #1, above, and while at the 1928 North High Street location approximately at the time of Bank Robbery #3, above.

16. Per Accurint, the user of phone (614) 604-2595 is Hussein Mohamed (MOHAMED). Additionally, on February 23, 2024, MOHAMED was arrested for an active

state warrant related to theft and receiving stolen property by the Hilliard Police Department while driving a Honda Accord with Ohio license plate HXS8626. The phone number listed on Hilliard Police Department's report for MOHAMED was (614) 604-2595. Also, a pawnshop receipt from Lev's Pawn shop located at 3524 East Broad Street, Columbus, Ohio, showed that MOHAMED listed phone number (614) 604-2595 when he pawned items on March 1, 2024. Research into MOHAMED'S family indicates that Saida Sheolh, the registered owner of the Honda Accord, is believed to be the mother of MOHAMED. Per the Franklin County Auditor's website, Saida Sheolh is listed as the owner of 64XX Scarlett Lane, Dublin, Ohio, which is known to your affiant. MOHAMED'S listed address in OHLEG is the same address, 64XX Scarlett Lane, Dublin, Ohio.

17. Per Accurint the user of phone number (614) 779-3279, the other of the 2 phone numbers identified during a review of the T-Mobile records, is an individual law enforcement believes to be using an alias, hereinafter "Suspect #2." Suspect #2's address in Accurint was listed as 25XX Merriwick Crossing Drive, Unit XXX, Columbus, Ohio 43219, which is known to your affiant. Additionally, in January of 2023, Columbus Police Department served a search warrant to Meta, Inc. for information related to a Facebook account associated with Suspect #2. Search warrant returns from Meta, Inc. showed that phone number (614) 779-3279 was used to register the Suspect #2 Facebook account.

18. T-Mobile to provided historical call detail records, including location information, for phone numbers (614) 604-2595 and (614) 779-3279 from March 11, 2024, to April 26, 2024. The records provided from T-Mobile show that on April 11, 2024 (date of Robbery #1), both phones were utilizing cellular towers in the area of Merriwick Crossing Drive prior to Robbery #1 taking place (Robbery #1 occurred at approximately 4:41 p.m.) At approximately 4:01 p.m.,

both phones begin utilizing cellular towers to the north of the area of Merriwick Crossing Drive, which your affiant interprets to mean that the phones departed the area of Merriwick Crossing Drive. From approximately 4:12 p.m. to 4:57 p.m. both phones were utilizing cellular towers in the area of 5380 North Hamilton Road (address of Robbery #1), which covers the time that Bank Robbery #1 took place, 4:41 p.m. At approximately 5:24 p.m., both phones were back utilizing cellular towers in the area of Merriwick Crossing Drive, which your affiant interprets as MOHAMED and Suspect #2 returning to Merriwick Crossing Drive after Robbery #1.

19. The records from T-Mobile reveal a similar pattern on the date of Robbery #2 and Robbery #3.

20. Based on both phones being together prior to, during, and after each bank robbery, the phones being in contact with one another at two of the robbery locations, and there being two individuals in the silver Honda Accord that was seen on video with one individual throwing the bank GPS device out of the window, the affiant believes that MOHAMED and other(s) were working together to commit the bank robberies.

21. On May 10, 2024, United States Magistrate Judge Kimberly A. Jolson issued warrants to search for evidence, fruits, and tools related to the robberies. (*see* Warrant, Case No. 2:24-MJ-241 through 2:24-MJ-247).

22. On May 14, 2024, law enforcement agents executed the search warrants. MOHAMED was at the home at 64XX Scarlett Lane, Dublin, Ohio when agents executed the warrant. Multiple electronic devices, including at least one cell phone, was also located and recovered. The Honda Accord was parked at the home.

23. At the 25XX Merriwick Crossing Drive, Unit XXX property, investigators located the following upon execution of the search warrant:

- a. a Patagonia sweatshirt, believed to have been worn during Robbery #1;
- b. a red hooded sweatshirt, believed to have been worn during Robbery #2;
- c. pants, believed to have been worn during the robberies;
- d. black New Balance shoes, believed to have been worn during the robberies;
- e. a loaded handgun;
- f. MOHAMED's wallet and identification;

24. Also at the Merriwick Crossing Drive, Unit XXX property, there were 2 males present. One male is believed to be Suspect #2. At property, recovered was a Texas identification card in the name of Suspect #2's alias and with Suspect #2's picture. Also at the property was a government identification card with Suspect #2's actual name and information, and his picture as well.

25. The deposits of Telhio Credit Union were insured by the National Credit Union Share Insurance Fund, which is administered by the National Credit Union Administration, on April 11, 2024.

26. The deposits of Fifth Third Bank and Huntington Bank were insured by the Federal Deposit Insurance Corporation on April 16, 2024.

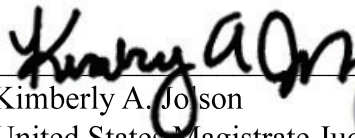
27. Based on the foregoing, I believe that there is probable cause to issue a criminal complaint and arrest warrant for Hussein A. MOHAMED for violations of 18 U.S.C. § 2113, bank robbery, and 18 U.S.C. § 371.

Respectfully submitted,



Tyler Schwab
Special Agent
FBI

Subscribed and sworn to before me on May 14, 2024



Kimberly A. Johnson
United States Magistrate Judge

